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May 26, 2016

VIA ECF

Honorable P. Kevin Castel
United States District Judge
U.S. District Court for the Southern District
500 Pearl Street
New York, N.Y. 10013

Re: United States v. Han Cavan, 09 Cr. 1120 (PKC)

Judge Castel:

I am the attorney of record for Han Cavan, the defendant in the above-referenced matter pending before your Honor. On the last court date, Your Honor set tomorrow, May 27, 2016, for simultaneous submissions of supplemental memoranda of law on the defendant's Constitutional Speedy Trial Motion. I am writing to request a two-week extension for the simultaneous submissions. The reasons for my request is that I was engaged in a state-court murder trial for three weeks, which ended two weeks ago. I submitted a I have been trying to obtain the minutes from the last conference in this matter so that I could be sure to address all of the Court's questions and concerns. I spoke to the court reporter's office on or about May 18, 2016, and was told that the minutes were prepared but that I needed to submit a CJA-24. I submitted that form on May 19, 2016, but it was returned to me, for failure to fill in one of the boxes. I re-submitted the CJA-24 on May 20, 2016, but to date, it seems not to have been acted on (unlike my previous attempt, I have not received any notification that my submission is somehow defective, though I do not rule it out). Thus, I have not yet obtained the minutes.

I have spoken to AUSA Edward Imperatore, counsel for the Government, and he has advised me that he has no objection to this request. Furthermore, because the Court had ordered simultaneous submissions and in order to avoid me having an unfair advantage due, it is requested that the Government also be given a two-week extension.

Sincerely,
/s/ Arnold J. Levine
Arnold J. Levine (AL6819)
Attorney for Defendant, Han Cavan

c: AUSA Edward Imperatore (by ECF)